

# GREATER**LONDON**AUTHORITY

## Good Growth

  
Nexus Planning  
By email

**Our ref:** 2025/0001/P2I  
**Date:** 21 March 2025

Dear 

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008**  
**Site:** Land south of Crockenhill Road, St Mary Cray, Bromley, Land south of Crockenhill Road, St Mary Cray, Bromley  
**LPA:** Bromley  
**Our reference:** 2025/0001/P2I

Further to the pre-planning application meeting held on 12 February 2025, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely

  
Head of Development Management

cc  Deputy Head of Development Management  
TfL

## Land south of Crockenhill Road

Local Planning Authority: Bromley

### The proposal

Residential-led development comprising up to 350 homes, public open space, and green and blue infrastructure.

### The applicant

The applicant is **Lands Improvement Holdings**, the agent is **Nexus Planning**, and the architects are **LDA Masterplanning**.

### Assessment summary

The site could meet the NPPF definition of grey belt land and there is a demonstrable unmet need for housing within the London Borough of Bromley. In principle, the proposal appears capable of meeting the NPPF Golden Rules, however, given the low PTAL, necessary infrastructure improvements should include enhancements to public transport and active travel to ensure that the site is a sustainable location for the development proposed.

Continued design work should focus on the evolution of a design-led masterplan layout that adopts best practice urban design principles; supports an efficient use of land through optimised densities; and avoids a car dominated development by promoting active travel as part of a vision-led approach.

### Key next steps

The future application will need to address the issues raised in this report with respect to land use principles, affordable housing, urban design, transport, sustainable development, and environment.

### Follow up meetings

A follow up meeting is strongly recommended on grey belt analysis, urban design, and transport infrastructure to progress the key next steps above.

## Context

1. On 12 February 2025 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held on MS Teams with the following attendees:

### GLA group

- [REDACTED], Senior Strategic Planner, GLA (case officer)
- [REDACTED], Team Leader – Development Management, GLA
- [REDACTED], Strategic Planner, GLA
- [REDACTED], Senior Design Officer, GLA
- [REDACTED], Assistant Planner, TfL

### Applicant

- [REDACTED], Lands Improvement Holdings
- [REDACTED], Nexus Planning
- [REDACTED], Nexus Planning
- [REDACTED], LDA Masterplanning
- [REDACTED], LDA Masterplanning
- [REDACTED], LDA Masterplanning
- [REDACTED], LDA Landscape
- [REDACTED] SLR Highways
- [REDACTED], SLR Highways

2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

### **Site description**

3. The site comprises approximately 16 hectares of agricultural land. It slopes downward from the northern and southern boundaries to the lowest point, at the centre of the site. A Public Right of Way bisects the site in an east-west direction.
4. The site is located adjacent to the settlement boundary at St Mary Cray. Existing low-density suburban residential development is situated to the north, south, and west of the site. The St Mary Cray Recreation Ground is located immediately west of the site, whilst there is agricultural land to the east forming part of a wide swathe of Green Belt stretching to Crockenhill and beyond to the A20/M25.
5. The Site is entirely within the Green Belt. The site does not contain any heritage assets but is within close proximity to the Kevington Hall Grade II\* Listed Building as well as the St Mary Cray Conservation Area.
6. The site has a Public Transport Access Level (PTAL) of 1a, on a scale of 1-6b. The closest train station is St Mary's Cray, which is approximately 1.8km from the site, providing access to Thameslink and Southeastern services. The site is a short walk from a number of bus stops providing access to the R4 and R6 bus routes to St Mary's Cray Station as well as the 477-route operated by Arriva Kent Thameside.

## Details of this proposal

7. The proposal is for the mixed-use development of this site comprising up to 350 residential homes, public open space, and green and blue infrastructure.
8. The future application is expected to be referable to the Mayor under the following categories of the Mayor of London Order 2008:
  - **Category 1A** - “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”
  - **Category 1B** - “Development which comprises or includes the erection of a building outside Central London and with a total floorspace of more than 15,000 square metres”
  - **Category 3D**: “Development -
    - On land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and
    - Which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

## Strategic planning issues and relevant policies and guidance

9. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Bromley Local Plan (2019); and the London Plan 2021.
10. The following are relevant material considerations:
  - The National Planning Policy Framework (2024) and National Planning Practice Guidance;
  - National Design Guide (2021).
11. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

|                      |                                                                                                                                                           |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Good Growth        | <i>London Plan;</i>                                                                                                                                       |
| • Green Belt         | <i>London Plan;</i>                                                                                                                                       |
| • Open land          | <i>London Plan; All London Green Grid SPG;</i>                                                                                                            |
| • Housing            | <i>London Plan; Housing SPG; the Mayor’s Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards LPG;</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor’s Housing Strategy;</i>                                                      |
| • Urban design       | <i>London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site</i>                       |

- Capacity: A Design-Led Approach LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards LPG;*
- Fire Safety
*London Plan, Fire Safety draft LPG;*
- Inclusive access
*London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;*
- Sustainable development
*London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; London Environment Strategy;*
- Air quality
*London Plan; the London Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;*
- Transport and parking
*London Plan; the Mayor's Transport Strategy;*
- Green Infrastructure
*London Plan; the London Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban greening factor LPG;*

## Summary of meeting discussion

12. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect land use principles including grey belt, affordable housing, design, and transport. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

## Land use principles

13. Objective GG2 of the London Plan seeks to create successful sustainable mixed-use places that make the best use of land. It also seeks to protect and enhance London's open spaces, including the Green Belt whilst also promoting the optimisation of land and exploration of the potential to intensify the use of land to support additional homes.
14. Objective GG4 seeks to ensure that more homes are delivered and supports the delivery of the strategic target of 50% of all new homes being genuinely affordable.

### Green belt

15. The subject site is identified as Green Belt. Policy G2 of the London Plan seeks to protect the Green Belt from inappropriate development except where very special circumstances exist.

16. The recently updated NPPF (2024) introduced the concept of the grey belt, being land in the Green Belt that is either previously developed land or that does not strongly contribute to select Green Belt purposes.
17. Paragraph 155 of the NPPF sets out that development in the Green Belt, on land comprising grey belt, may not be regarded as inappropriate development where all of the following apply:
  - a) *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
  - b) *There is a demonstrable unmet need for the type of development proposed;*
  - c) *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
  - d) *Where applicable the development proposed meets the 'Golden Rules' requirements.*
18. In response the Mayor is undertaking a London-wide Green Belt review which will assist plan preparation by providing a technical assessment of how land parcels perform against section 13 of the NPPF and recent PPG, and the NPPF definition of grey belt. The findings of the review will be published in due course as part of the evidence base for the draft London Plan. Whilst the strong preference of GLA officers is for grey belt development to be aligned with strategically coordinated plan-making, the NPPF also enables individual grey belt proposals to be considered on their merits via the development management process.

#### Grey belt

19. The NPPF (2024) defines 'grey belt' as:

*'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'*
20. Paragraph 143 relates to the purposes of Green Belt. The three paragraphs referenced within this definition above are:
  - a) *to check the unrestricted sprawl of large built-up areas*
  - b) *to prevent neighbouring towns merging into one another*
  - d) *to preserve the setting and special character of historic towns*
21. The site does not constitute previously developed land (PDL). Nevertheless, having regard to the characteristics of the site and its context (refer to site description above), and guidance within National PPG, GLA officers are of the view that it could be demonstrated that the site does not strongly contribute to any purpose (a), (b), or (d).
22. Nevertheless, further justification should be provided by the applicant in response to all three purposes, as well as in relation to footnote 7 of the NPPF, to demonstrate whether the site meets the definition of grey belt. Where grey

belt status can be demonstrated, the associated considerations within NPPF paragraph 155 would apply. Initial consideration of these is set out below.

#### Relationship to remaining Green Belt

23. Having regard to the characteristics of the site and its context; the Green Belt purposes within NPPF paragraph 143; and the nature of the proposals themselves, GLA officers are generally satisfied that grey belt development on this site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Nevertheless, the applicant should provide appropriate justification to support this.

#### Demonstrable unmet need

24. As considered within the housing section below, Bromley is unable to demonstrate a 5-year housing land supply and the Housing Delivery Test demonstrates that the borough has delivered well below 75% of its housing requirement over the past three years. As such, there is a clear demonstrable unmet need for housing within the London Borough of Bromley.

#### Sustainable location

25. The important question of whether the proposed development is in a sustainable location is closely linked to the availability/provision of sustainable transport modes, including active travel and public transport options. The site currently registers a PTAL of 1a and a public transport capacity and/or connectivity contribution may be required. This is discussed further in the transport section below, and further engagement with TfL and Bromley Council is strongly recommended.

#### Golden Rules

26. There are three 'Golden Rules' that have been introduced within the updated NPPF (2024). These represent contributions that should be made where residential development is proposed within the Green Belt. They relate to affordable housing, necessary infrastructure improvements, as well as provision of/improvements to publicly accessible green space. Notably, NPPF Paragraph 158 states that development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.
27. Considerations and advice in relation to the Golden Rules criteria are set out within the housing, transport and urban design sections of this report respectively. In summary, the applicant is proposing 50% affordable housing and an on-site provision of publicly accessible green open space. The applicant is also exploring the potential for improvements to the neighbouring St Mary Cray Recreation Ground. Further discussions are required on public transport capacity and/or connectivity, and the applicant should engage with Bromley Council and relevant utilities providers on other infrastructure requirements as necessary.
28. It is apparent that the scheme is being designed in response to the Golden Rules and the emerging proposals are encouraging at this stage. Nevertheless, further work and engagement is required, particularly in relation to infrastructure and sustainable travel improvements.

## Summary

29. The site could meet the NPPF definition of grey belt land and in principle the proposal appears capable of meeting the NPPF Golden Rules. However, the provision of necessary infrastructure improvements are integral to the acceptability of this site for residential development, particularly in relation to public transport and active travel.

## **Housing**

30. Policy H1 of the London Plan, in seeking to increase the supply of housing in London, sets borough housing targets and allocates to the London Borough of Bromley a target of 7,740 for the period 2019/20 to 2028/29.

### Bromley's Housing Delivery

31. As discussed, Paragraph 155 of the NPPF (2024) requires that there is a demonstrable unmet need for the type of development proposed. For a housing development, footnote 56 of the NPPF clarifies that demonstrable unmet need means:

*'the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years'.*

### *Housing delivery test*

32. The Housing Delivery Test (HDT) is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies, over a rolling 3-year period. The most recent measurements, published in December 2024, outline the 2023 measurement figures.

*Table 1: Housing Delivery Test figures for the London Borough of Bromley (published in the Government's HDT: 2023 measurement)*

| Year    | Housing Target | Delivered | Percentage        |
|---------|----------------|-----------|-------------------|
| 2020-21 | 427            | 436       | 102%              |
| 2021-22 | 641            | 104       | 15.9%             |
| 2022-23 | 641            | 456       | 71.1%             |
| Total   | 1709           | 996       | 58% (Presumption) |

33. The 641 dwellings per annum figure, used within the Government HDT measurements, is the housing requirement set out in the Bromley Local Plan. The current London Plan figure for Bromley is 774 dwellings per annum.
34. The planning policy consequences of the HDT indicating that a local planning authority's delivery has fallen below their housing requirement are set out in the NPPF and include the 'presumption in favour of sustainable development'.



### *Five-year housing land supply*

35. The five-year housing land supply (FYHLS) is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement. The Council's most recent assessment of the FYHLS is set out in the London Borough of Bromley Housing Trajectory 2021 (published November 2021). The base date of the FYHLS assessment within this document is 1st April 2021 and the five-year period runs through to 31st March 2026.
36. The housing requirement for the FYHLS period is set out in the London Plan and the most recent housing delivery figures outlined above. The FYHLS (from April 2021 to March 2026) should be measured against the adopted housing requirement of 774 dwellings per annum plus a 20% buffer (given delivery falls below 75% of the requirement over the previous three years). As such, the base FYHLS requirement is 4,644 dwellings.
37. The Bromley Housing Trajectory 2021 document shows that Bromley's FYHLS (covering the period 2021/22 to 2025/26) is 3,245 units. This equates to 3.49 years. This is a significant undersupply and, given a FYHLS cannot be demonstrated, means that the 'presumption in favour of sustainable development' applies.

### *Summary*

38. Bromley is unable to demonstrate a FYHLS and the HDT demonstrates that the borough has delivered well below 75% of its housing requirement over the past three years. As such, there is a clear demonstrable unmet need for housing within Bromley.

### Affordable housing

39. London Plan Policies H4, H5 and the Mayor's Affordable Housing and Viability SPG seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London.
40. London Plan Policy H5 sets out the 'threshold approach' to planning applications whereby schemes that meet or exceed the relevant threshold of affordable housing by habitable room without public subsidy, meet the relevant tenure mix and meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor are eligible to follow the Fast-Track Route (FTR); this means that they are not required to submit a viability assessment or be subject to a late stage viability review. In this circumstance the FTR threshold would normally be 35%, however, in line with the numerical requirement outlined in Paragraph 67 of the NPPF, a 50% threshold will be applied in line with the Golden Rules.
41. At this stage, the applicant is proposing to deliver 50% affordable housing by habitable room across all residential typologies. As currently proposed, the affordable housing offer would be eligible for the FTR and would represent a significant public benefit. Further detail should be provided as to the overall housing mix and tenure split.
42. Policy H6 requires affordable housing to be split between: 30% low-cost rented homes, 30% intermediate products, and the remaining 40% to be determined by the borough. The Bromley Local Plan seeks a tenure split of 60% social-rented/affordable rented housing and 40% intermediate provision. Therefore,

the applicant should be seeking to deliver a minimum of 60% of the affordable dwellings as low-cost, social rented homes.

43. Should the applicant not meet the criteria for Fast Track, it would be required to pay the GLA's viability assessment costs, and an upfront payment (when the application is considered at Stage 1) of £10,000 plus VAT per application would be required. Additional guidance can be found [here](#).

#### Summary

44. Bromley is currently unable to demonstrate a FYHLS and the HDT demonstrates that the borough has delivered well below 75% of its housing requirement over the past three years. As such, there is a demonstrable unmet need for the type of development proposed.
45. The inclusion of 50% affordable housing would meet the Golden Rules and be eligible for the FTR. 50% affordable housing would also represent a significant public benefit of this proposal.

#### **Urban design**

46. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
47. Policy D4 sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny.

#### Development layout and open space

48. The layout should be designed having regard to the need for public transport and active travel improvements which should improve the linkages of this site towards St Mary's Cray Railway Station and Orpington Town Centre and Orpington Railway Station.
49. The proposed masterplan principles are generally supported by officers. The positioning of non-residential uses as a cluster at the centre is positive and would help to create a focus and sense of vibrancy within the masterplan. The provision of open space adjoining the St Mary Cray Recreation Ground is also supported, providing benefits through consolidation of open space areas. Contributions towards improvements to St Mary Cray Recreation ground should also be considered as part of discussions with Bromley Council.



50. As discussed at the meeting, GLA Officers recommend that the applicant considers the placement of a landscaped 'village green' within the site to bring key amenity to the heart of the scheme (aligned with higher density) and to help create a well-defined and activated public space.
51. Further information is required on the positioning of vehicular routes through the site. The vehicular roads could be better integrated and tied into the surrounding street network so that existing connections can be reinforced. In line with London Plan Policy D3, further information is required regarding how the proposals can support and promote active travel.
52. Officers would welcome further information regarding the parking strategy for the proposals. A parking strategy that results in cars dominating the site would not be supported. Where necessary, the applicant should integrate parking thoughtfully across the site, making use of a mixture of end-on parking, bays, and small parking courts, to reduce the impact of parking on the pedestrian and cyclist experience.
53. Given the Green Belt location of the site it is strongly recommended that the landscape and public realm offer makes considerable contributions to biodiversity, sustainable urban drainage and climate resilience. Measures including meadows, swales, SUDs basins and rain gardens on the site's periphery would be strongly encouraged.

#### Height, scale, and massing

54. The height and scale of the development would not raise any strategic concerns, and GLA officers would encourage the applicant team to explore opportunities to optimise residential densities at the heart of the site through the use of mansion block typologies.
55. The applicant has proposed densities ranging from 25-35dph on the periphery of the site, rising to 40-50dph at the heart. The provision of a range of densities is positive, however, GLA Officers would encourage the applicant to explore

how densities could be further increased at the heart of the site in order to optimise its capacity further and create a vibrant centre to the masterplan.

#### Architectural design

56. If the scheme is brought forward in Outline, GLA Officers would welcome the inclusion of a design code to ensure quality is secured for future reserved matters applications. The code should cover an approach to character areas of the masterplan, building form and massing, public realm, appearance and character, and the treatment of different key site conditions.
57. The illustrative material provided to date displays a very standard approach to the appearance and materiality of the buildings. GLA officers strongly recommend that the applicant continues to develop the approach, and seeks to respond to the existing character of St Mary Cray, identifying and reinterpreting the special and valued features and characteristics that are unique to this locality in line with Policy D3.

#### Fire safety

58. In line with Policy D12 of the London Plan the future application should be accompanied by a fire statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

#### Inclusive access

59. Policy D3 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment.
60. Policy D5 of the London Plan requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

### **Transport**

#### Healthy Streets

61. Any application must be supported by a full Healthy Streets Transport Assessment (TA) including a day and night-time Active Travel Zone (ATZ) assessment having regard to TfL guidance. This is particularly important in this case given the site's low PTAL location, where car mode share is likely to be much higher than the London Plan policy targets for active travel and public transport use. The scope should be broad to include shops/restaurants, health and children's support facilities, schools, bus stops and open space and focussing in particular on overcoming severance (physical and perceived). These assessments should lead to a commitment to proposed mitigation

measures, in particular improvements to support and encourage active travel, building on any improvements planned/delivered by the Council.

62. The proposals to increase the walkability and connectivity of the site are broadly supported, and consideration should be given to the accessibility, safety, and amenity of these connections in line with Policy T2. These improvements should be highlighted in the TA and linked to the ATZ assessment.
63. The design of the development itself should also put people, rather than vehicles first, making it easy to choose to walk, cycle and use public transport, for example walking and cycling routes should be safe and direct from all parts of the development.

#### Transport network impact

64. A detailed trip generation and impact analysis should be provided at the planning application stage. Based on this assessment, a public transport capacity and/or connectivity contribution may be required, for example routing a bus through the development. Early discussion with TfL prior to submission is recommended and this should be done through the TfL pre-application meeting.
65. Local traffic modelling, for example access junctions, may be required, and although the roads surrounding the site are borough highways, TfL would be interested in the safety and bus journey time impacts.

#### Car parking

66. Given the low PTAL outer London location, the London Plan recognises that some car parking would be expected, but should not exceed the maximum parking standards outlined in Table 10.3. Disabled persons' parking should be provided in line with Policy T6.1. Car club provision should be considered as a means of reducing car parking provision below this maximum provision.
67. Also, Policy T2 states that development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving. Thus, further information regarding car parking should be provided in a draft Transport Assessment, with particular consideration given to minimising the car-dominated nature of the development through considerate design. The 'blank canvas' should allow for a 'liveable, sustainable neighbourhood' to be designed in from the outset.
68. This, coupled with reducing car parking below London Plan maximum levels, supported by car club provision, improved, and integrated bus service provision and exemplar walking and cycling routes would not only help meet London Plan mode share targets, but also provide more space for uses such as children's play space, landscaping and biodiversity net gain.

#### Cycle parking

69. Long and short stay cycle parking provision should at least meet both the minimum quantity and quality standards outlined in Policy T5 including the London Cycle Design Standards (LCDS). Further details on this should be provided within the planning application, including the amount of space and

layout within the parking areas and showing the routes from street to parking for each plot.

#### Delivery and Servicing and Construction Logistics

70. A draft Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) should be provided with any planning submission and a full DSP/CLP secured through condition at determination stage.
71. The access routes to and from the site will need to be identified, with the aim of minimising potential conflict with pedestrians and cyclists and bus services. Peak hour delivery restrictions may be required, and the use of cargo bikes (inter and intra site) should be maximised and encouraged.

#### Travel plan

72. A draft Travel Plan should be provided with the planning application, detailing targets and measures to increase active and sustainable travel in line with the Mayor's Strategic Mode Shift target outlined in Policy T1. The Travel Plan is particularly important in this case given the low PTAL would likely make it challenging to meet mode share targets.
73. The Travel Plan should seek to incentivise the use of active travel and public transport, through tangible measures such as financial incentives/member benefits for non-car users accessing the site, especially the intra-site community use. This would complement the design measures and potential improvements to bus services outlined above.

### **Sustainable development**

#### Energy strategy

74. GLA officers recommend the applicant consider embedding the energy strategy in the early design stage. Further assessment guidance, template, and recommended condition wording are available on the GLA website. The London Plan requires all major developments to meet the Mayor's net-zero carbon target, and so carbon savings must be maximised on site. At the very minimum, an on-site 35% reduction in carbon emissions beyond Part L of 2021 Building Regulations must be met.

#### Whole Life-Cycle Carbon Assessment

75. GLA officers recommend the applicant considers the WLC principles at the early design stage, in accordance with London Plan Policy S12. Full detailed technical comments are included the GLA Energy Memo (Appendix 2). Further assessment guidance, template, and recommended condition wording are available on the GLA website.

#### Circular Economy

76. GLA officers recommend the applicant considers the CE principles at the early design stage, in accordance with London Plan Policy D3 and S17. Full detailed technical comments are included the GLA Circular Economy Memo (Appendix 3). Further assessment guidance, template, and recommended condition wording is available on GLA website.

## **Environmental issues**

### Urban greening

77. London Plan Policies G1 and G5 embed urban greening as a fundamental aspect of site and building design. Features such as street trees, green roofs, rain gardens, wildflower meadows, woodland, and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised. The applicant must calculate the Urban Greening Factor as set out in London Plan Policy G5.

### Sustainable drainage and flood risk

78. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy SI13.
79. The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy, as set out in London Plan Policy SI13. The roofs and new public realm/landscaping areas present a key opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, thereby providing amenity and water quality benefits.

### Air quality

80. London Plan Policy SI1 states that development proposals should be accompanied by an air quality assessment and be at least air quality neutral. An Air Quality Assessment must be submitted as part of any future application. Additionally, a construction dust risk assessment should be submitted in order to reduce emissions associated with the demolition and construction of the proposed building.
81. If the development is subject to the EIA regulations, then it must consider the air quality positive approach in line with Policy SI1(C) of the London Plan. An Air Quality Positive Statement will be required - the applicant is referred to the Air Quality Positive London Plan Guidance. Evidence of consideration of air quality in the development design will be required.

### Biodiversity

82. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The applicant should provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D).

## **Conclusion**

83. The site could meet the NPPF definition of grey belt land and there is a demonstrable unmet need for housing within the London Borough of Bromley. In principle, the proposal appears capable of meeting the NPPF Golden Rules, however, given the low PTAL, necessary infrastructure improvements should include enhancements to public transport and active travel to ensure that the site is a sustainable location for the development proposed.

84. Continued design work should focus on the evolution of a design-led masterplan layout that adopts best practice urban design principles; supports an efficient use of land through optimised densities; and avoids a car dominated development by promoting active travel as part of a vision-led approach.

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for further information, contact GLA Planning Unit (Development Management Team):

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